

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: LAURENCE ZWIRN,

Debtor,

Chapter 7

Case No.: 20-17343

Judge A. Benjamin Goldgar

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on December 7, 2020, at 9:30 A.M., I will appear before the Honorable Judge A. Benjamin Goldgar, or any judge sitting in that judge's place, and present the motion For Relief From the Automatic Stay, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 500 0972 and the password is 726993. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Alliant Credit Union

By: 

Wator & Associates, P.C.
Dariusz T. Wator, ARDC# 6279496
10711 S. Roberts Road
Palos Hills, IL 60465
(708) 974-0000
bankruptcy@mvillinoisatty.com

CERTIFICATE OF SERVICE

I, Dariusz T. Wator, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on November 12, 2020, before 5:00 p.m.

Label Matrix for local noticing
0752-1
Case 20-17343
Northern District of Illinois
Eastern Division
Tue Nov 3 12:04:04 CST 2020

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

(p)ALLIANT CREDIT UNION
BANKRUPTCY DEPARTMENT
11545 W TOUHY AVE
CHICAGO IL 60666-5000

Ashley Zimmerman
760 Indian Springs
Buffalo Grove, IL 60089-1404

Golan Christi Talia, LLP
70 W Madison Street
Suite 1500
Chicago, IL 60602-4265

Heartland Bank & Trust
PO Box 67
Bloomington, IL 61702-0067

Heartland Bank and Trust Company
c/o Jacobs & Pinta
77 W. Washington Street, Suite 1005
Chicago, IL 60602-3259

Irena Vasile & Mario Bodeanu
44 Regent Drive
Buffalo Grove, IL 60089

Jason Song
Buffalo Grove, IL 60089

Lakeview Loan Servicing
PO Box 37628
Philadelphia, PA 19101-0628

Lakeview Loan Servicing
PO Box 8068
Virginia Beach, VA 23450-8068

Lakeview Loan Servicing, LLC
c/o McCalla Raymer Leibert Pierce, LLC
Bankruptcy Department
1544 Old Alabama Road
Roswell, GA 30076-2102

MBM Assoc Inc
1834 Walden Office Square
Suite 150
Schaumburg, IL 60173-4281

MBM Associates, Inc.
126 E Wing Street
Suite 335
Arlington Heights, IL 60004-6064

Steven & Kim Duncan
790 Silverrock
Buffalo Grove, IL 60089-1435

Wator & Associates, PC
Attorneys at Law
10711 S Roberts Road
Palos Hills, IL 60465-2313

William Kaman
640 Northview Lane
Hoffman Estates, IL 60169-4147

David M Siegel
David M. Siegel & Associates
790 Chaddick Drive
Wheeling, IL 60090-6005

John E Gierum
John E Gierum
Gierum & Mantas
2700 S. River Road
Suite 308
Des Plaines, IL 60018-4117

Laurence J. Zwirn
2304 Magnolia Ct. E
Buffalo Grove, IL 60089-6610

Marilyn Zwirn
2304 Magnolia Ct. E
Buffalo Grove, IL 60089-6610

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Alliant Credit Union
11545 West Tohy Ave.
Chicago, IL 60666

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: LAURENCE ZWIRN,

Debtor,

Chapter 7

Case No. 20-17343

Judge A. Benjamin Goldgar

MOTION FOR RELIEF FROM THE AUTOMATIC STAY

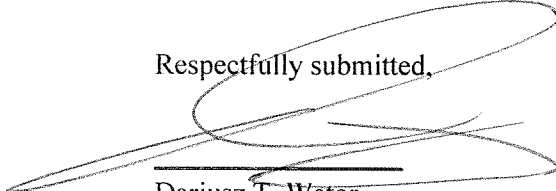
NOW COMES, ALLIANT CREDIT UNION (“Creditor”), by and through its attorneys, Wator & Associates, P.C., and requests that the Automatic Stay heretofore entered related to the LAURENCE ZWIRN (“Debtor”), be modified, stating as follows:

1. Debtor is the owner of a real estate located at 5825 Blue Heron Drive, Long Grove, Illinois 60047 (the “Property”).
2. The Debtor has executed a security agreement and is obligated to Creditor, a copy of which is attached hereto respectively as Exhibit “A.”
3. On September 21, 2020, the above captioned Chapter 7 was filed.
4. As of the date of filing of this motion, the outstanding balance on the Mortgage and Note is \$954,848.00.
5. Since the date of filing of this petition, Debtor has made no payments to Creditor.
6. Debtor has elected to surrender the Property as shown in the Statement of Intent, see Exhibit “B.”
7. Debtor’s failure to make pre and post-petition mortgage payments as well as Debtor’s election to surrender the Property constitutes sufficient grounds for relief from the automatic stay for cause pursuant to 11 U.S.C. 362(d)(1).
8. Alliant Credit Union continues to be injured each day they remain bound by the Automatic Stay;
9. Alliant Credit Union is not adequately protected and continues to suffer financial loss due to Debtor's failure to pay the mortgage;

10. No good cause exists to delay the enforcement and implementation of relief from the Automatic Stay and Bankruptcy Rule 4001(a)(3) should be waived.

WHEREFORE, THE MOVANT respectfully prays that the Automatic Stay be modified and Bankruptcy Rule 4001(a)(3) be waived as not applicable, and leave be granted to Alliant Credit Union for such other and further relief as this Honorable Court deems just.

Respectfully submitted,



Dariusz T. Wator
ARDC No. 6279496
10711 S. Roberts Road
Palos Hills, Illinois 60465
Tel: (708) 974-0000